

**REMARKS**

Claims 1 through 8 are currently pending in the application. Claim 1 has been amended. Claim 2 has been canceled. Reconsideration of the application is respectfully requested.

This amendment is in response to the Office Action of April 25, 2003.

Claims 1, 2 and 4 are rejected under 35 U.S.C. § 102(b) as being anticipated by Nguyen (U.S. Patent 5,155,066).

Claims 3, 6, 7 and 8 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Nguyen (U.S. Patent 5,155,066).

Claim 5 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Nguyen (U.S. Patent 5,155,066) in view of Evers (U.S. Patent 5,810,926) or Japan 06291156 (Derwent acc number 1995-002639)

**Rejections Under 35 U.S.C. § 102(b)**

Applicant submits that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently, described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Claims 1, 2 and 4 are rejected under 35 U.S.C. § 102(b) as being anticipated by Nguyen (U.S. Patent 5,155,066).

Nguyen describes dispensing an adhesive formulation on a substrate, after which the semiconductor dies are placed on the adhesive. Thereafter, the substrate with the accompanying semiconductor devices is continuously passed through a heating zone to cure the adhesive. (Col. 7, lines 44-57).

Claim 1, as amended herein, recites a method of attaching a semiconductor die to a lead frame comprising providing a source of lead frames, providing a source of semiconductor die, heating at least one of the semiconductor die, applying snap curable adhesive to portions of one of the lead frames, and contacting the active surface of one of the heated semiconductor die with the lead frames.

Nguyen does not describe heating a semiconductor die, then contacting the heated die

with a lead frame. Rather, Nguyen states, “The semiconductor assembly is then cured by heating.” (Col. 7, lines 14-16). The semiconductor die is heated only as a part of an assembly.

Therefore, Nguyen does not identically disclose each and every element of claim 1 as presently amended herein in amended independent claim 1. Accordingly, it is respectfully submitted that claim 1 is not anticipated by Nguyen under 35 U.S.C. § 102.

Claim 4 is allowable, among other reasons, as depending from claim 1, which is allowable.

#### **Rejections Under 35 U.S.C. § 103(a)**

Claims 3, 6, 7 and 8 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Nguyen (U.S. Patent 5,155,066).

Applicant submits that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicant’s disclosure.

Claim 3 is allowable, among other reasons, as depending from claim 1, which should be allowed.

Claim 6 recites a method of attaching a semiconductor die to a lead frame comprising providing a source of lead frames and a source of semiconductor die, applying snap curable adhesive to portions of the active surface of one of the semiconductor die, and contacting the snap curable adhesive with portions of one of the lead frames.

Nguyen fails to teach or suggest all of the limitations of claim 6 of the present invention to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed invention. Specifically, Nguyen fails to teach applying snap curable adhesive to portions of the active surface of a semiconductor die. Nguyen teaches or suggests dispensing adhesive formulation on a substrate. Further, there is no motivation in the reference or from the knowledge

generally available in the prior art which would lead one of ordinary skill to modify the reference to add the missing limitation. Therefore, Nguyen cannot and does not establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the presently claimed invention.

Claim 5 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Nguyen (U.S. Patent 5,155,066) in view of Evers (U.S. Patent 5,810,926) or Japan 06291156 (Derwent acc number 1995-002639)

Claim 5 is allowable, among other reasons, as depending from claim 1, which should be allowed.

### Conclusion

For the reasons set forth hereinabove, Applicant submits that claims 1 and 3 through 8 are clearly allowable over the cited prior art.

Applicant requests the allowance of claims 1 and 3 through 8 and the case passed for issue.

Respectfully submitted,



James R. Duzan  
Registration No. 28,393  
Attorney for Applicant  
TRASKBRITT  
P.O. Box 2550  
Salt Lake City, Utah 84110-2550  
Telephone: 801-532-1922

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